ID: CCA_2010030313110437 Number: **201014054** Release Date: 4/9/2010

Office:

UILC: 6221.00-00

From:

Sent: Wednesday, March 03, 2010 1:11:04 PM

To: Cc:

Subject: RE: Designation of TMP

I don't think it matters that no return was filed. Under section 6221 we can determine partnership items regardless of whether a return was filed.